

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1-22 are pending in this application.

Rejection Under 35 U.S.C. §102:

Claims 1-22 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Gryphon et al (U.S. '537, hereinafter "Gryphon"). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Applicant respectfully submits that Gryphon fails to disclose each element of the claimed invention. For example, Applicant submits that Gryphon fails to disclose searching a generic process plan for a predetermined pattern contained in a non-generic process element and inserting contents from the non-generic process element into the generic process plan on detection of the predetermined pattern so as to newly generate a process plan which contains process instructions that are non-identical than that of the generic process plan, as required by claims 1-22.

Gryphon discloses a graphical modeling language called visual business modeling language (visual BML). Visual BML is a method of graphical notation that can be used to represent business process knowledge and corresponding business information that comprise a business model. Visual BML uses a collection of symbols to represent various parts of the business model in order to provide a mechanism for compiling, documenting and/or viewing the business model. For example, the visual BML disclosed

by Gryphon utilizes a pentagon symbol 145 to represent a step, a triangle symbol 156 to represent an action, a diamond symbol 154 to represent a business rule, a star symbol 152 to represent an event, and a hexagon symbol 135 to represent a translation map. These symbols can be used to represent a business model without a computer (col. 1, lines 4-42). Indeed, Gryphon discloses that the visual BML “is not limited to computer-based implementations: hand-drawn models (as with pen and ink on paper or chalk on a blackboard) are also within the scope “of the disclosed system.” (See col. 8, lines 31-35).

Accordingly, a user of the visual BML system disclosed by Gryphon may use the above symbols and visual templates to represent a business process model. The visual BML appears to be somewhat similar to developing a flow chart to represent a business process, although Gryphon purports that visual BML is different from developing an ordinary flowchart in various ways as described in col. 1, line 66 to col. 2, line 29 and col. 8, lines 38-61.

Gryphon is not concerned at all with altering a process by the insertion of content therein in order to newly generate a new process plan which contains process instructions which are non-identical than the original process. The present invention relates to storing one generic process plan, as well as at least one non-generic process element which contains a predetermined pattern. The generic process plan is searched for the predetermined pattern such that content from the non-generic process element can be inserted into the generic process plan when the predetermined pattern is detected for newly generating a process plan. The newly generated process plan may be particularly suitable for a given situation on the basis of a generic process plan which has been

devised on a more generic level to deal with situations of the same type as the particular situation.

The Office Action apparently alleges that col. 6, lines 1-20 and col. 6, line 47 to col. 7, line 40 of Gryphon discloses the above claimed feature. Applicant respectfully disagrees. Col. 6, lines 1-20 merely discloses assigning various symbols to represent portions of the business process. In particular, col. 6, lines 1-14 discloses assigning a triangle (action) symbol 156 to represent work being performed within a process. Col. 6, lines 14-20 discloses assigning a star (catch event) symbol 152 to represent an external event that initiates a portion of a business process. Col. 6, line 47 to col. 7, line 40 merely discloses an outline of how visual BML symbols may be used during a particular analysis of a business process (in this case, the business process is processing an incoming customer phone call). (See, e.g., col. 6, lines 34-39).

The use of the visual BML during a discussion of such a business model may ensure a rigorous description of that model which facilitates the translation of that discussion into actual business data and processes. The visual BML can thus be used to capture the business model characteristics during discussions as opposed to writing random notes during the discovery of the model and later attempting to transcribe them into BML after the fact. However, the visual BML (which again is a method of graphical notation to represent the business model) fails to disclose or suggest searching a generic process plan for a predetermined pattern contained in a non-generic process element and inserting contents from the non-generic process element into the generic process plan on

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detection of the predetermined pattern so as to newly generate a process plan which contains process instructions that are non-identical than that of the generic process plan.

Accordingly, Applicant submits that claims 1-22 are not anticipated by Gryphon and respectfully requests that the rejection of these claims under 35 U.S.C. §102 be withdrawn.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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